

HONORABLE JUSTIN L. QUACKENBUSH

Mr. Steven C. Lacy  
Lacy Kane, P.S.  
455 6th St. NE  
East Wenatchee, WA 98802  
(509) 884-9541

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

BRANDI JACKSON,	)	
	)	
Plaintiff,	)	NO. CV-06-00364-JLQ
	)	
vs.	)	PLAINTIFF'S WITNESS LIST
	)	
ALBERTSON'S, INC.,	)	
	)	
Defendant.	)	
_____	)	

Plaintiff Brandi Jackson, through Steven C. Lacy of Lacy Kane, P.S.,  
pursuant to the Scheduling Conference Order dated March 7, 2007, submits this  
list witnesses who may be called at trial.

1. Brandi Jackson  
211 Ridgemont Drive  
East Wenatchee, WA 98802  
(509) 630-3643

Brandi Jackson would have information concerning her  
employment at Albertson's and the frequent and unwanted touching and sexual  
overtures towards her by the store director Greg Bruggman. She would also have  
information concerning how the frequent and unwanted touching and sexual



1 overtures affected her employment at Albertson's and the distress it caused in her  
2 life.

3           2.     Greg Bruggman  
4                 Address unknown  
5                 Albertson's Employee  
6                 Mr. Bruggman would have information regarding his frequent  
and unwanted touching of the plaintiff.

7           3.     Sundi Perez  
8                 Address unknown  
9                 East Wenatchee, WA 98802  
10                (509) 884-1424  
11                Sundi Perez would have information that Greg Bruggman kept  
12                sending the plaintiff email messages to Banner Bank (the plaintiff's place of  
employment following Albertson's). Sundi also spoke to Greg Bruggman and  
13                asked him to leave the plaintiff alone.

14           4.     Eric Thielen  
15                 920 Westchester Drive  
16                 Wenatchee, WA 98802  
17                 (509) 667-7982  
18                 Eric Thielen is an Albertson's employee and would have  
information in this case as he was upset that the plaintiff was receiving favorable  
19                treatment by the store director, Greg Bruggman.

20           5.     Rhonda Yenney  
21                 Address unknown  
22                 Wenatchee, WA 98801  
23                 (509) 662-6494  
24                 Rhonda Yenney, as a subordinate of the plaintiff's while the  
plaintiff was still employed at Albertson's, may have information regarding the  
25                frequent and unwanted touching of the plaintiff by Greg Bruggman.

26           6.     Sarah Johnson  
27                 Address Unknown  
28                 Sarah Johnson, as a subordinate of the plaintiff's while the



1 plaintiff was still employed at Albertson's, may have information regarding the  
2 frequent and unwanted touching of the plaintiff by Greg Bruggman.

3 7. Susan Evans  
4 Susan Evans Counseling, MSW  
5 434 Orondo  
6 Wenatchee, WA 98802  
7 (509) 662-7632

8 Susan Evans provided counseling to Brandi Jackson through  
9 the summer of 2006. She would be able to provide testimony as to the diagnosis,  
10 prognosis, causation and treatment she provided for injuries Brandi sustained as a  
11 result of the frequent and unwanted touching by Greg Bruggman.

12 8. Gina Mulhall  
13 Address unknown  
14 Albertson's employee

15 Gina Mulhall may have information regarding the issues in this  
16 matter as she was also possibly the victim of sexual harassment by Greg  
17 Bruggman.

18 9. Amy McDaniel  
19 Address unknown  
20 Former Albertson's employee

21 Amy McDaniel may have information regarding the issues in  
22 this matter as she was also possibly the victim of sexual harassment by Greg  
23 Bruggman.

24 Plaintiff hereby reserves the right to call any fact witnesses identified  
25 by Defendants in discovery and/or designated witness lists filed with the Court at  
26 the time of trial.



1 DATED this 30th day of April, 2007.

2 By s/ Steven C. Lacy

3 WSBA NO. 10814

4 Attorney for Plaintiffs

5 Lacy Kane, P.S.

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8 East Wenatchee, WA 98802

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2007, I electronically filed Plaintiff's  
Witness List with the Clerk of the Court using the CM/ECF System, which will  
send notification of such filing to the following:

Kenneth J. Diamond  
Winterbauer & Diamond, P.L.L.C.  
1200 Fifth Avenue, Suite 1910  
Seattle, WA 98101

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s/ STEVEN C. LACY  
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